# U.S. DISTRICT COURT UNITED STATES DISTRICT COURTEASTERN DISTRICT-WI EASTERN DISTRICT OF WISCONSIN

2025 MAY -6 P 2: 20

UNITED STATES OF AMERICA,

CLERK OF COURT
\*\*FILED UNDER SEAL\*\*

Plaintiff,

Case No. 25-CR-088

v.

BRANDON R. OWENS.

XAVYION D. HUMPHREY-SMITH, and JAMAREON J. JACKSON,

[18 U.S.C. §§ 2(a), 924(c), & 1951(a)]

Defendants.

#### INDICTMENT

#### COUNT ONE

(Hobbs Act Robbery, 18 U.S.C. § 1951)

#### THE GRAND JURY CHARGES THAT:

- 1. At all times material to this Indictment, the Prestige Collective store located at 140 South 1st Street in Milwaukee, Wisconsin, was a business engaged in the purchase and sale of articles and commodities in interstate and foreign commerce.
  - 2. On or about February 25, 2025, in the State and Eastern District of Wisconsin,

# BRANDON R. OWENS, and XAVYION D. HUMPHREY-SMITH

obstructed, delayed, and affected commerce, and the movement of articles and commodities in commerce, by robbery, in that the defendants took and obtained U.S. currency and store merchandise from and in the presence of an employee of Prestige Collective, against the

employee's will by means of actual and threatened force, violence, and fear of injury, and aided and abetted the same.

All in violation of Title 18, United States Code, Sections 1951(a) and 2(a).

### **COUNT TWO**

(Brandishing a Firearm During and in Relation to a Crime of Violence, 18 U.S.C. § 924(c))

#### THE GRAND JURY FURTHER CHARGES THAT:

On or about February 25, 2025, in the State and Eastern District of Wisconsin,

## BRANDON R. OWENS, and XAVYION D. HUMPHREY-SMITH

knowingly used, carried, and brandished a firearm during and in relation to a crime of violence, that is, robbery, as charged in Count One of this Indictment, and aided and abetted the same.

In violation of Title 18, United States Code, Sections 924(c)(1)(A)(ii) and 2(a).

#### **COUNT THREE**

(Hobbs Act Robbery, 18 U.S.C. § 1951)

#### THE GRAND JURY FURTHER CHARGES THAT:

- 1. At all times material to this Indictment, the Walgreens store located at 9040 West Good Hope Road in Milwaukee, Wisconsin, was a business engaged in the purchase and sale of articles and commodities in interstate and foreign commerce.
  - 2. On or about March 2, 2025, in the State and Eastern District of Wisconsin,

### BRANDON R. OWENS,

# XAVYION D. HUMPHREY-SMITH, and JAMAREON J. JACKSON

obstructed, delayed, and affected commerce, and the movement of articles and commodities in commerce, by robbery, in that the defendants took and obtained U.S. currency from and in the presence of an employee of Walgreens, against the employee's will by means of actual and threatened force, violence, and fear of injury, and aided and abetted the same.

All in violation of Title 18, United States Code, Sections 1951(a) and 2(a).

#### **COUNT FOUR**

(Brandishing a Firearm During and in Relation to a Crime of Violence, 18 U.S.C. § 924(c))

#### THE GRAND JURY FURTHER CHARGES THAT:

On or about March 2, 2025, in the State and Eastern District of Wisconsin,

#### BRANDON R. OWENS,

# XAVYION D. HUMPHREY-SMITH, and JAMAREON J. JACKSON

knowingly used, carried, and brandished a firearm during and in relation to a crime of violence, that is, robbery, as charged in Count Three of this Indictment, and aided and abetted the same.

In violation of Title 18, United States Code, Sections 924(c)(1)(A)(ii) and 2(a).

A TRUE BILL:

LOWESTVOOM

Date: 5/6/2025

RICHARD G. FROHLING Acting United States Attorney